

(Stipulating parties listed on signature page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

Electrograph Systems, Inc. et al. v.
Technicolor SA, et al., No. 13-cv-05724;

Alfred H. Siegel, as Trustee of the Circuit
City Stores, Inc. Liquidating Trust v.
Technicolor SA, et al., No. 13-cv-05261;

Best Buy Co., Inc., et al. v. Technicolor SA,
et al., No. 13-cv-05264;

Interbond Corporation of America v.
Technicolor SA, et al., No. 13-cv-05727;

Office Depot, Inc. v. Technicolor SA, et al.,
No. 13-cv-05726;

Costco Wholesale Corporation v.
Technicolor SA, et al., No. 13-cv-05723;

P.C. Richard & Son Long Island
Corporation, et al. v. Technicolor SA, et al.,
No. 31:cv-05725;

Schultze Agency Services, LLC, o/b/o
Tweeter Opco, LLC, et al. v. Technicolor SA,
Ltd., et al., No. 13-cv-05668;

Sears, Roebuck and Co. and Kmart Corp. v.
Technicolor SA, No. 3:13-cv-05262;

Target Corp. v. Technicolor SA, et al., No.
13-cv-05686;

**STIPULATION AND [PROPOSED]
ORDER EXTENDING THE DEADLINE
TO FILE MOTION TO COMPEL
DIRECT ACTION PLAINTIFFS TO
RESPOND TO CERTAIN OF THE
THOMSON DEFENDANTS'
DISCOVERY REQUESTS**

Judge: Hon. Samuel Conti

1 *Tech Data Corp., et al. v. Hitachi, Ltd., et*
 2 *al., No. 13-cv-00157;*

3 *Sharp Electronics Corp., et al. v. Hitachi,*
 4 *Ltd., et. al., No. 13-cv-01173.*

5
 6 Direct Action Plaintiffs Electrograph Systems, Inc.; Electrograph Technologies, Corp.;
 7 Alfred H. Siegel (as trustee of the Circuit City Stores, Inc. Liquidating Trust); Best Buy Co., Inc.;
 8 Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.;
 9 BestBuy.com, L.L.C.; Magnolia Hi-Fi, Inc.; Interbond Corporation of America; Office Depot,
 10 Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation; ABC
 11 Appliance, Inc.; MARTA Cooperative of America, Inc.; Schultze Agency Services, LLC, (on
 12 behalf of Tweeter Opco, LLC, and Tweeter Newco, LLC); Sears Roebuck and Co. and Kmart
 13 Corp.; and Target Corp.; Sharp Electronics Corporation and Sharp Electronics Manufacturing
 14 Company of America, Inc., (collectively, “Sharp”); Tech Data Corporation and Tech Data
 15 Product Management, Inc.; (all collectively the “DAPs”) on the one hand, and Thomson S.A.
 16 (n.k.a. Technicolor S.A.) and Thomson Consumer Electronics, Inc. (n.k.a. Technicolor USA, Inc.)
 17 (collectively the “Thomson Defendants”) on the other (together, the “Parties”) have conferred by
 18 and through their counsel and, subject to the Court’s approval, HEREBY STIPULATE AS
 19 FOLLOWS:

20 WHEREAS, on March 21, 2014, the Court entered a scheduling order setting the close of
 21 fact discovery for September 5, 2014 (Dkt. No. 2459);

22 WHEREAS, the deadline to file any motion to compel after the discovery cut-off is
 23 September 12, 2014 (L.R. 37-3);

24 WHEREAS, on August 1, 2014, the Thomson Defendants served discovery requests on all
 25 DAPs, including Thomson SA’s Second Set of Requests for Production, seeking, *inter alia*,
 26 documents reflecting both formal and informal communications between the DAPs and others
 27 regarding their intention to exclude themselves from the Direct Purchaser Plaintiff Class in this
 28 litigation (the “Opt-Out Discovery Request”);

1 WHEREAS, on or around September 5, 2014, all DAPs served their responses to the Opt-
2 Out Discovery Request, which responses included objections on various grounds;

3 WHEREAS, on September 9, 2014, the Thomson Defendants sent a meet and confer letter
4 to the DAPs regarding issues with their responses and the Parties have since met and conferred in
5 a conference call and in subsequent correspondence with a *bona fide* intent to continue doing so;

6 WHEREAS, the Thomson Defendants and the DAPs agree to extend the deadline for the
7 Thomson Defendants to file a motion to compel relating to issues specific to the DAPs' responses
8 and objections to the Opt-Out Discovery Request to September 19, 2014;

9 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** between the
10 undersigned counsel that the Thomson Defendants may file a motion to compel on issues specific
11 to the Opt-Out Discovery Request on or before September 19, 2014.

12 The undersigned parties jointly and respectfully request that the Court enter this stipulation as
13 an order.

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15
16 Dated: _____

Hon. Samuel Conti
United States District Judge

1 Dated: September 12, 2014

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21 Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this
22 document has been obtained from each of the above signatories.